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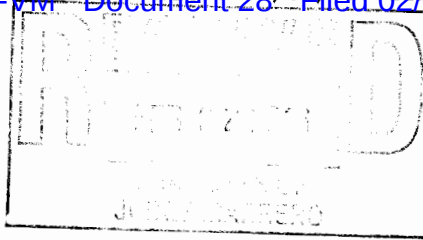
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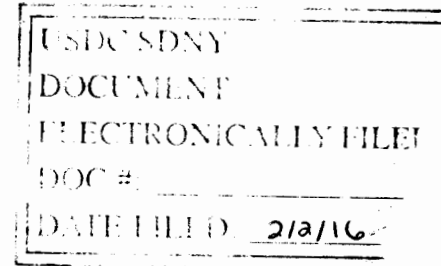
DACHENG
LAW
OFFICES

大成律师事务所

February 2, 2016

VIA FACSIMILE

Hon. Victor Marrero
United States District Court, Southern District of New York
Suite 660
United States Courthouse
500 Pearl Street
New York, New York 10007
(212) 805-6382



Re: Euro Pacific Capital Inc. v. Bohai Pharmaceuticals Group Inc.
Case No.: 15 Civ. 4410 (VM)

Dear Judge Marrero:

This office represents the defendant, Bohai Pharmaceuticals Group, Inc. ("Bohai"), in the above-referenced matter. On January 22, 2016, we received electronic notice of the Court's January 21, 2016 order denying Bohai's motion to dismiss and compel arbitration (Doc. No. 27). Pursuant to Fed. R. Civ. P. 12(a)(4), Bohai is required to file a responsive pleading by February 5, 2016.

Bohai's operations are in China and its representatives reside and work in China. The Chinese New Year holiday period began on February 1, 2016 and will continue through the week of February 15, 2016. As a result, Bohai's offices will be closing during that time period and its representatives will be unavailable to assist our firm to prepare and file an appropriate response. As a result of the unavailability of Bohai representatives and other professional commitments of the undersigned counsel, we seek a 14-day extension of time, up to and including **February 19, 2016**, to file a responsive pleading.


This is Bohai's first request for an extension of time to file a responsive pleading to the amended complaint (Doc. No. 13). Plaintiff's counsel has indicated that they will only consent to a 7-day extension of time and have not provided a basis for objecting to the full 14 days requested. We submit that the additional time would not unduly prejudice the plaintiff as a scheduling order has yet to be entered in this case.



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Respectfully submitted,

DACHENG LAW OFFICES L.L.P.
Counsel to Bohai Pharmaceuticals Group, Inc.

By: 
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Request GRANTED. The time for defendant(s) to answer or otherwise move with respect to the complaint in this action is extended to <u>2-19-16</u>	
SO ORDERED.	
<u>2-2-16</u> DATE	 VICTOR MARRERO, U.S.D.J.